

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-293-JRG (Lead Case)
vs.)	
)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO., LTD, ET)	
AL.,)	<div style="background-color: black; width: 150px; height: 1.2em;"></div>
)	
Defendants.)	
)	
)	
)	
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NETLIST, INC.,)	
)	
Plaintiff,)	
)	Case No. 2:22-cv-294-JRG (Member Case)
vs.)	
)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.; MICRON)	
SEMICONDUCTOR PRODUCTS, INC.;)	<div style="background-color: black; width: 150px; height: 1.2em;"></div>
MICRON TECHNOLOGY TEXAS LLC,)	
)	
Defendants.)	
)	
)	
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**DECLARATION OF MICHAEL R. RUECKHEIM IN SUPPORT OF DEFENDANTS'
MOTION TO STRIKE EXPERT REPORT OF DR. MANGIONE-SMITH**

FILED UNDER SEAL

I am an attorney at the law firm of Winston & Strawn LLP, counsel of record for Defendants Micron Technology, Inc., Micron Semiconductor Products, Inc., and Micron Technology Texas LLC (collectively, “Micron”) in the above captioned matter. I am a member in good standing of the State Bar of Texas. I provide this declaration in support of Micron’s Motion to Strike Expert Report of Dr. Mangione-Smith.

1. A true and correct copy of Dr. Mangione-Smith’s Opening Expert Report is attached as **Exhibit A**.

2. A true and correct copy of Exhibit B to Dr. Mangione-Smith’s Opening Expert Report is attached as **Exhibit B**.

3. A true and correct copy of Exhibit C to Dr. Mangione-Smith’s Opening Expert Report is attached as **Exhibit C**.

4. A true and correct copy of Exhibit E to Dr. Mangione-Smith’s Opening Expert Report is attached as **Exhibit D**.

5. A true and correct copy of Netlist’s Preliminary Infringement Contentions is attached as **Exhibit E**.

6. A true and correct copy of Exhibit A-1 to Netlist’s Preliminary Infringement Contentions is attached as **Exhibit F**.

7. A true and correct copy of excerpts from JEDEC’s JESD79-4C specifications is attached as **Exhibit G**.

8. A true and correct copy of a redline comparison of Dr. Mangione-Smith’s technical comparability analysis from the *Netlist, Inc. v. Micron Technology, Inc.*, 22-cv-203 (E.D. Tex.) case and the present case is attached as **Exhibit H**.

9. A true and correct copy of Dr. Mangione-Smith's Proposed Supplemental Expert Report is attached as **Exhibit I**.

10. A true and correct copy of IDS DDR4 Dat Buffer 3200 datasheet is attached as **Exhibit J**.

11. A true and correct copy of excerpts from the public/redacted version of Netlist's Infringement Contention from the 22-cv-203 case is attached as **Exhibit K**.

* * *

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on January 16, 2024.

By: /s/ Michael R. Rueckheim
Michael R. Rueckheim